

Message

From: Konkus, John [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=555471B2BAA6419E8E141696F4577062-KONKUS, JOH]
Sent: 3/20/2019 4:42:42 PM
To: Dunlap, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=591eb15a268249dda0c05a7451f765c3-Dunlap, Dav]
CC: Woods, Clint [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc65010f5c2e48f4bc2aa050db50d198-Woods, Clin]; Fitzmorris, Amanda [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4051a5cf28144ee599b7cb3e9c2527bf-Fitzmorris,]
Subject: RE: CASAC, manipulative causation, your draft letter on the ISA for pm/ Media request

Deliberative Process / Ex. 5

From: Dunlap, David
Sent: Wednesday, March 20, 2019 12:39 PM
To: Konkus, John <konkus.john@epa.gov>
Cc: Woods, Clint <woods.clint@epa.gov>; Fitzmorris, Amanda <fitzmorris.amanda@epa.gov>
Subject: Re: CASAC, manipulative causation, your draft letter on the ISA for pm/ Media request

Deliberative Process / Ex. 5

DDD

David D. Dunlap
Deputy Assistant Administrator
EPA Office of Research & Development
Office Personal Matters / Ex. 6

On Mar 20, 2019, at 12:19 PM, Konkus, John <konkus.john@epa.gov> wrote:

I think, now that Dr. Cox has given his response, we can give her a higher level response of our own.
Thoughts?

Deliberative Process / Ex. 5

From: Yeow, Aaron
Sent: Wednesday, March 20, 2019 12:15 PM
To: Press <Press@epa.gov>
Cc: Brennan, Thomas <Brennan.Thomas@epa.gov>
Subject: FW: CASAC, manipulative causation, your draft letter on the ISA for pm/ Media request

FYI...

-Aaron

Aaron Yeow, M.P.H.
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From: tcoxdenver@aol.com <tcoxdenver@aol.com>
Sent: Wednesday, March 20, 2019 11:06 AM
To: susanne.rust@latimes.com
Cc: Yeow, Aaron <Yeow.Aaron@epa.gov>
Subject: CASAC, manipulative causation, your draft letter on the ISA for pm/ Media request

Susanne, my answers follow. These are my own personal views; I am not speaking for the CASAC or the EPA.

Please let me know any other questions.

Best,

-- Tony

1) Your email suggests the letter you wrote on March 7 to Administrator Wheeler is not a consensus letter. Have the other members of CASAC reviewed it?

The March 7 letter/report is a draft, not yet finalized nor transmitted to Administrator Wheeler. The draft is currently under review by the CASAC for our meeting later this month. After the CASAC deliberates on the draft letter/report, it will be revised accordingly and finalized as a consensus letter/report and transmitted to the Administrator.

2) Do you think you will get consensus?

TC: The purpose of the March 28 teleconference is for the CASAC to deliberate on the Draft letter/report, discussing any revisions necessary to finalize it as a consensus letter/report for transmittal to the Administrator.

3) In the letter, you ask for two things: A new draft ISA and "access to additional technical expertise, as needed" for draft review. Many of the committee are asking for a reappointment of the PM panel. Are you asking for that, as well? And if not, can you be specific about what you are asking for? What you envision this would be/ look like?

TC: As indicated to you previously, the draft letter/report is still draft, is intended to aid in meeting deliberations, and is not to be quoted or cited as it is not final and may be revised as a result of CASAC deliberations. Therefore I will not comment directly on the

draft letter/report. However, two things that came out of the CASAC discussions at the public meeting in December are that the ISA should provide clear definitions of key terms and that it should follow standard scientific method in deriving its conclusions from data and documenting their derivations. These requests are made in response to the specific charge questions that EPA asked us to respond to. These charge questions do not ask the CASAC to opine or to offer consensus opinions on whether to reappoint the PM panel. However, at the public meeting in December, the members of CASAC agreed that we should ask for ready access to any additional technical expertise needed to thoroughly and responsibly review the scientific aspects of the ISA when they have been developed. Once the ISA is revised to clarify the derivations of its key conclusions, different sets of detailed expertise may become valuable in reviewing those derivations.

4) Your comments suggest that you found the first ISA draft wanting. You use words such as "untrustworthy" "subjective" that is full of "opinions." Is this your view? Or all of CASAC's? And is it your opinion that 11 iterations of CASAC panels, which included nearly 140 independent scientists, were non-scientific and lacking objectivity?

TC: The charge questions given to us do not call for the CASAC to formulate opinions about the work of previous CASAC panels. Our focus is on the current Draft ISA. At the public meeting in December, we discussed opportunities for more thorough and systematic coverage of relevant literature, clearer definitions of key terms used to communicate conclusions, and closer adherence to the scientific method. The draft letter/report will be deliberated by the CASAC on the March 28 teleconference and the final letter/report that will be transmitted to the Administrator will be the CASAC's consensus advice.

5) Many scientists I have spoken to say your viewpoint of PM science is fringe, and that your views are outside the mainstream. How do you respond to this?

TC: My viewpoint on PM science is that it should be held to the same standards as other types of applied science. This implies that it should provide clear definitions of key terms, independently verifiable and reproducible derivations of conclusions, and empirical tests of its predictions. I have no response to whether people label such requirements as mainstream or fringe; to me, they are important parts of sound, reproducible, trustworthy science, and that is what I care about.

6) Scientists I have spoken to - and included in the Goldman/ Dominici essay - suggests your leadership on this panel is reckless, that you are pushing fringe views without consideration of decades worth of scientific precedence - , and as a result, you are putting EPA in a precarious spot: They can accept your input and adjust their draft accordingly, as they are supposed to do by policy (even if they disagree with your science, and discard the viewpoints of former panels including scores of scientists), or they ignore you, thus eroding the credibility and importance of the CASAC process. What are your thoughts on this?

TC: I believe and hope that this view is incorrect. I believe that EPA is committed to doing good science and the goal of CASAC is to provide advice on the science.

7) Do you believe that particulate matter is linked to death?

TC: If by "linked" you mean "associated with," then yes: PM is associated with death in many studies. For example, my own research and the research of many other scientists in many countries over many decades has confirmed positive associations among extreme temperatures, PM exposure concentrations, and mortality rates in multiple data sets. More generally, as I stated in a recent paper (www.ncbi.nlm.nih.gov/pubmed/29627760), "Associations between fine particulate matter (PM_{2.5}) exposure concentrations and a wide variety of undesirable outcomes, from autism and auto theft to elderly mortality, suicide, and violent crime, have been widely reported. Influential articles have argued that reducing National Ambient Air Quality Standards for PM_{2.5} is desirable to reduce these outcomes. Yet, other studies have found that reducing black smoke and other particulate matter by as much as 70% and dozens of micrograms per cubic meter has not detectably affected all-cause mortality rates even after decades, despite strong, statistically significant positive exposure concentration-response (C-R) associations between them."

8) And finally - I understand you are an independent consultant who has worked for the petroleum and chemical industries in the past. Do you feel your viewpoints are influenced by your funding sources?

TC: I have done independent research and consulting for national and international governments, the World Health Organization, a wide variety of industries (predominantly, telecommunications and healthcare), a wide variety of state and Federal agencies (including the EPA, but also USDA, FDA, DOE, and others) under multiple administrations. In all cases, I try to make sure that all of my conclusions are backed by independently verifiable derivations from data, and that I follow the data wherever it leads, without regard for funding sources.